

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

Myriam Fejzulai and Monica Moore,) Civil Action No. 6:14-cv-03601-BHH
individually and on behalf of all others)
similarly situated,)
)
Plaintiffs,)
)
v.)
)
Sam’s West, Inc.; Sam’s East, Inc.; and)
Wal-Mart Stores, Inc. (all d/b/a “Sam’s)
Club” and/or “Sam’s Wholesale Club”),)
)
Defendants.)
)

**PLAINTIFFS' MOTION FOR CERTIFICATION OF A SETTLEMENT
CLASS, PRELIMINARY APPROVAL OF SETTLEMENT,
AND APPROVAL OF NOTICE**

Plaintiffs, by and through their counsel, hereby move this Court, pursuant to Federal Rules of Civil Procedure 23(b)(3) and 23(e), for entry of an Order certifying the proposed settlement class, granting preliminary approval to this class action settlement, approving the class notice, and approving the establishment of a Qualified Settlement Fund. A memorandum in support of this motion is being filed contemporaneously herewith.

Defendants consent to the relief sought in this motion.

Respectfully submitted,

RICHARDSON, PATRICK, WESTBROOK &
BRICKMAN, LLC

/s/ T. Christopher Tuck

T. Christopher Tuck, ID No. 9135

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of October, 2017, I caused the foregoing document to be electronically filed with the Clerk of the Court using CM/ECF, which will provide electronic notice of such filing to all counsel of record.

s/ T. Christopher Tuck
T. Christopher Tuck